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13 Attorneys for Plaintiffs, Georgiou Family  
14 Trust; Byron Georgiou individually and as  
15 trustee of the Georgiou Family Trust; and  
16 Benjamin Hill Realty, LLC

17 **UNITED STATES DISTRICT COURT**  
18 **DISTRICT OF NEVADA**

19 Georgiou Family Trust, a Nevada trust;  
20 Byron Georgiou, as an individual and as  
21 trustee of the Georgiou Family Trust;  
22 Benjamin Hill Realty, LLC, a Nevada  
23 limited liability company.

24 Plaintiffs,

25 v.

26 Phillip V. Ruthen, an individual; Shaw  
27 Industries Inc., a corporation; L. Lake  
Jordan, an individual; Suncrest Stone  
Products, LLC, a business entity;  
Does 1-100,

Defendants.

CASE NO.: 2:21-cv-01060-JCM-DJA

**STIPULATION AND  
ORDER TO  
EXTEND TIME TO FILE  
PLAINTIFFS' RESPONSE TO  
DEFENDANTS' MOTIONS TO  
DISMISS AND MOTIONS TO  
CHANGE VENUE FROM  
CURRENT DEADLINE OF  
OCTOBER 1, 2021 TO OCTOBER  
15, 2021**

**(FIRST REQUEST)**

1                   **TO THE CLERK OF THE ABOVE-TITLED COURT AND TO ALL**  
 2 **PARTIES AND THEIR ATTORNEYS OF RECORD:**

3                   IT IS HEREBY STIPULATED by and between the parties through their  
 4 respective counsels that Plaintiffs Georgiou Family Trust; Byron Georgiou; and  
 5 Benjamin Hill Realty, LLC ("Plaintiffs") shall have through and including October 15,  
 6 2021, within which to file and serve a response to the motions of Defendants Phillip V.  
 7 Ruthen, Shaw Industries Inc. and L. Lake Jordan ("Defendants") to dismiss and/or to  
 8 change venue (ECF No. 22, 24, 25, 26, 29). The current deadline for Plaintiffs to  
 9 respond to all five motions is currently set for October 1, 2021.

10                  This is the first request for extension from the original due date of October 1,  
 11 2021. Pursuant to Local Rule IA 6-1(a), the Parties state the reason for the extension of  
 12 time is that the attorneys for Plaintiffs need to fully review all five motions and prepare  
 13 responses thereto. The motions to change venue contain factual allegations and alleged  
 14 evidence which Plaintiffs need sufficient time to review and respond to. The Parties  
 15 have therefore agreed to an extension of time to file a response. The Parties have  
 16 entered into an agreement in good faith and not for purposes of delay. It is respectfully  
 17 requested that the Court approve this stipulation and provide Plaintiffs until October 15,  
 18 2021 to respond to the motions.

19  
 20 DATED: September 30, 2021

21                   **MURCHISON & CUMMING, LLP**

22                   */s/ Pamela C. Chalk*

23                   Pamela C. Chalk, Esq.

24                   Anton N. Handal, Esq.

25                   Attorneys for Plaintiffs

26  
 27 DATED: September 30, 2021

28                   **LEWIS ROCA ROTHGERBER CHRISTIE LLP**

29                   */s/ J.Christopher Jorgensen*

30                   J.Christopher Jorgensen, Esq.

31                   Chelsee C. Jensen, Esq.

32                   Attorneys for Defendant

33                   Shaw Industries Inc.

1 DATED: September 30, 2021

**BAILEY ♦ KENNEDY**

/s/ Andrea M. Champion

Dennis L. Kennedy, Esq.

Andrea M. Champion, Esq.

Attorneys for Defendant Phillip V. Ruthen

5  
6 DATED: September 30, 2021

**LIPSON NEILSON P.C**

/s/ Megan H. Thongkham

Joseph P. Garin, Esq.

Megan H. Thongkham, Esq.

Attorneys for Defendant L. Lake Jordan

9  
10 IT IS SO ORDERED.

**ORDER**

  
11  
12 UNITED STATES DISTRICT COURT JUDGE

13 DATED: October 1, 2021

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing document has been served on this date to all counsel of record, if any to date, who are deemed to have consented to electronic service via the Court's CM/ECF system. Any other counsel of record will be served by electronic mail, facsimile and/or overnight delivery upon their appearance in this matter.

I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct. Executed this 30th day of September, 2021.

DATED: September 30, 2021

## MURCHISON & CUMMING, LLP

/s/ Pamela C. Chalk  
Pamela C. Chalk